



COMDTPUB 16700
NVIC 7-00
4 AUGUST 2000

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 7-00

Subj: CLARIFICATION OF THE APPLICATION OF THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING FOR SEAFARERS (STCW), 1978, AS AMENDED, TO VESSELS LESS THAN 200 GROSS REGISTER TONS (GRT)

1. PURPOSE. This policy clarifies the application of the STCW to U.S. mariners serving on U.S. flag vessels of less than 200 GRT (500 gross tonnage (GT) under the International Tonnage Convention).
2. ACTION. Use this Circular when evaluating the application of STCW to those mariners serving on U.S. flag vessels less than 200 GRT. Officers in Charge, Marine Inspection (OCMIs), should bring this Circular to the attention of the appropriate people in the marine industry within their zones. This NVIC is available on the World Wide Web at:

<http://www.uscg.mil/hq/g-m/nvic/index.htm>

3. DIRECTIVES AFFECTED. None.

4. BACKGROUND.

a. International Standards.

- (1) STCW regulation II/3 paragraph 7, together with section A-III/1 paragraph 9, section A-III/2 paragraph 8, and section A-III/3 paragraph 8 of the STCW Code, allows each Administration (government) to vary the requirements for masters, chief engineers, and officers of the navigation and engineering watches on board a vessel, dependent on the vessel's size and conditions of voyage.

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- (a) This variance is allowable for deck officers serving on a vessel less than 500 GT, which equates to 200 GRT, if the vessel's size and the conditions of its voyage make the application of the full requirements unreasonable or impracticable.
- (b) The variance also applies to engineering officers serving on near-coastal vessels powered by main propulsion machinery of less than 3,000 kW (4,000 HP). STCW doesn't apply to engineering officers serving on seagoing vessels less than 750 kW (1000 HP).
- (2) STCW regulation II/4 describes the minimal requirements for ratings forming part of a navigational watch. It applies only to unlicensed mariners working on seagoing vessels of 500 GT or more, and will not figure further in this Circular.
- (3) STCW regulation III/4 describes the minimal requirements for ratings forming part of a watch in a manned engine-room or designated to perform duties in a periodically unmanned engine-room. It and the corresponding STCW Code section A-III/4 apply only to seagoing vessels powered by main propulsion machinery of 750 kW (1,000 HP) propulsion power or more. It does not apply to U.S. vessels less than 200 GRT (500 GT) on domestic voyages, as per 4.b.(2) below.

b. Domestic Standards.

- (1) It is the policy of the Coast Guard that some variance is appropriate for personnel serving on U.S. flag vessels less than 200 GRT on domestic voyages. But the OCMi will consider the safety of all vessels operating in the same waters before it grants any such variance.
- (2) The Coast Guard has specifically determined that, for certain small vessels on domestic near-coastal voyages, the scheme of safety provided by the current licensing programs and the inspection and oversight programs for small vessels deliver a level of safety comparable to the STCW. Therefore, it imposes no new requirements either on mariners serving on passenger vessels of less than 100 GRT inspected under subchapter T or K or on other vessels less than 200 GRT on domestic voyages or on the owners or operators of such vessels.
- (3) For a master or other mariner (deck or engineering) serving on a vessel of less than 200 GRT on a domestic near coastal voyage no new requirements will be imposed, in accordance with Title 46, Code of Federal Regulation (46 CFR), sections 10.202(k), 12.02-7(f), and 15.103(f). This decision is due to the equivalency between STCW and current U.S. laws and industry practice. Holding a suitably endorsed U.S. license for service on these vessels complies with STCW under domestic laws.

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5. DEFINITIONS.

- a. Domestic service means a vessel used in trade from one U.S. port to another U.S. port. This could include a voyage to nowhere that returns to the originating port.
- b. Gross Tonnage (GT) is that tonnage as measured under the International Convention on Tonnage Measurement of Ships, 1969.
- c. Gross Register Tons (GRT) is that tonnage as measured under the U.S. tonnage measurement system found in Title 46, United States Code, section 14502 (46 U.S.C. 14502).
- d. Near-coastal voyages, as defined in STCW regulation I/1, means voyages in the vicinity of a Party (signatory government) as defined by that Party. The U.S. policy is that near-coastal voyages are those voyages within 200 miles of the U.S. shore and within the jurisdictional waters of the U.S.
- e. An international voyage means, for the purposes of this Circular, a sea voyage from a port in the United States to a port in a foreign country.
- f. Near Coastal, as defined within the 46 CFR 10.103, means ocean waters not more than 200 miles offshore. As noted in paragraph 5.c. above, each party to STCW has defined its own boundary for near coastal waters and that boundary may not be consistent with the definition within 46 CFR 10.103.

6. DISCUSSION.

- a. STCW regulation II/3, and sections A-III/1 and A-III/3 of the STCW Code, allow us to determine the portions of STCW that would be reasonable and practicable to apply on officers on vessels less than 200 GRT (500 GT) and 3,000 kW, as applicable, when full application would be unreasonable or impracticable. In 46 CFR 10.202 and 15.103(f), the application of STCW for officers on small vessels less than 200 GRT, except passenger vessels inspected under subchapter H, in the U.S. fleet on domestic voyages, as noted in 6.b. below, are not subject to further obligation under STCW on account of their special operating conditions.
- b. Neither any mariner serving on any of the following vessels, nor the owners or operators of the vessels, need meet the requirements of STCW, because they are either exempt by STCW or U.S. laws:
 - (1) Fishing vessels;
 - (2) Fish tender vessels as defined in 46 U.S.C. 2101;
 - (3) Pleasure yachts not engaged in trade;
 - (4) Wooden vessels of primitive build;

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- (5) Uninspected passenger vessels as defined in 46 U.S.C. 2101;
 - (6) Barges as defined in 46 U.S.C. 2101, including non-self-propelled mobile offshore-drilling units; and
 - (7) Vessels operating exclusively on the Great Lakes or the inland waters of the U.S. Inland waters, for the purposes of this Circular, mean those waters shoreward of the boundary line.
- c. No mariner serving on a vessel listed in the previous paragraph need either hold or be issued an STCW certificate.
 - d. Requirements for mariners serving on vessels on domestic voyages beyond the boundary line. An officer operating a small vessel on domestic voyages will have an appropriate STCW endorsement automatically placed directly on his or her license, except when operating any vessel listed in 6.b. above or a passenger vessel subject to subchapter H of Title 46 CFR. This entitlement goes for any officer on an inspected passenger vessel less than 100 GRT and on any other U.S. vessel less than 200 GRT (500 GT) (except as previously noted in 6.b. above) that is operating on a domestic voyage if the mariner does not already hold a STCW certificate. The endorsement should read as follows:

When the holder of this license is serving on a U.S. vessel of less than 200 gross register tons (500 gross tonnage) in domestic service, no added STCW endorsement is necessary to meet U.S. law implementing the STCW Convention.

- e. Requirements for mariners on international voyages.
 - (1) A mariner licensed for service on vessels of less than 100 GRT inspected under subchapter T or K, and on other vessels less than 200 GRT (500 GT), when operating on international voyages, except for voyage specific exemptions addressed in paragraph 6.e.(3) below, must meet the requirements for training and assessment of the applicable U.S. and STCW regulations, in accordance with 46 CFR 10.202. A mariner seeking a license or certificate valid for international voyages must meet the requirements for training and assessment of the STCW Code section A-II/3, A-III/1, A-III/3, or A-III/4 (where they apply to mariners on vessels not engaged on near-coastal voyages) and all other requirements of the STCW, including those on basic safety training, hours of rest, and watchkeeping of section A-VIII of the STCW Code. A license endorsed for near coastal waters is not valid for international voyages or operation in waters of a foreign country.
 - (2) An unlicensed mariner assigned a watch in an engine-room or designated to perform duties in a periodically unmanned engine-room on a vessel on an international voyage, must have an STCW endorsement documenting that he or she meets the competencies of the STCW Code, section A-III/4, in accordance with 46 CFR 12.02-7(e). This

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requirement applies only to those vessels driven by main propulsion machinery of 750 kW of propulsion power or more. Any mariner who entered into service before August 1, 1998, and holds a merchant mariner's document endorsed as qualified member of the engine department, need only meet the requirement for basic safety training for issuance of a 1995 STCW certificate. For further information on the transitional arrangements, see Navigation and Vessel Inspection Circulars 4-97 and 8-97.

- (3) An officer licensed for service on vessels covered by this Circular and not otherwise specifically exempt from the requirements of STCW, may have a separate STCW certificate or endorsement issued when the OCMI determines that such certificate or endorsement is necessary to enable a specific vessel or vessels to occasionally operate on a voyage specific route. The OCMI should consider the following before he or she issues such a certificate or endorsement:
 - (a) A letter from the company explaining the necessity to allow their employees to operate on international voyages.
 - (b) Each crewmember requiring an STCW certificate must meet the following requirements:
 - 1. Holds a license endorsed for oceans route (knowledge of COLREGS, ocean navigation). If filling an officer's position on the vessel.
 - 2. Demonstrated proficiency (knowledge and/or demonstration) of the safety & navigational equipment installed on the vessel. The demonstration should be conducted in the presence of a marine inspector; ideally during the most recent annual inspection or reinspection.
 - 3. Either completed STCW basic safety training or has demonstrated proficiency in emergency drills (man overboard, abandon ship, fire emergency, steering failure, etc...). The demonstration should be conducted in the presence of a marine inspector; ideally during the most recent annual inspection or reinspection.
 - (c) A letter or other documentation that details the mariners experience on the specific vessel(s) to be considered. The details should at least include vessel name(s), official number(s), length of service on each vessel, and routes on which the mariner has served.
- (4) This paragraph sets forth a method to issue a STCW certificate to a mariner required to make an occasional international voyage, whose routine trade is on domestic voyages, when the OCMI determines a certificate is warranted by the necessity of the circumstances. A certificate issued under paragraph 6.e.(3) may not serve to establish experience or training necessary for raises of grades of licenses or certificates. It must

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bear a limitation within the CAPACITY-LIMITATIONS section with an endorsement listed in either paragraph 6.e.(4)(i) or (ii) below and the endorsement of paragraph (iii):

- (a) If the limitation is vessel-specific, adjacent to the CAPACITY (master, mate, chief engineer, or the like) it should read:

Restricted to service on M/V XXXXXXXX.

- (b) If the limitation is to a specific class of sister vessels owned by a specific company, adjacent to the CAPACITY it should read, for example:

Restricted to Small Passenger Vessels of Delta Hull 88 design owned by ABC Charters, Inc. of not more than 100 gross register tons/500 gross tonnage (or applicable vessel description and/or tonnage limitation).

The tonnage limitation in most cases should also appear in gross tonnage. This specific example demonstrates the endorsement for a license restricted to small passenger vessels not more than 100 GRT.

- (c) The certificate should also include an endorsement for the specific route, which should read:

Valid for voyages between the United States and (applicable port) only.

- f. Direct questions you may have regarding this guidance to any Regional Examination Center or the National Maritime Center at (202) 493-1000.

Rear Admiral R.C. North

/s/

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